

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

PRO SE CIVIL COMPLAINT

FILED
U. S. DISTRICT COURT
DISTRICT OF NEBRASKA

15 JUN 15 PM 1:38

OFFICE OF THE CLERK

Case No. 8:15 CV 220
(the court will assign a number)

I. CASE CAPTION: Parties to this Civil Action:

Pursuant to Fed. R. Civ. P. 10(a), the names of all parties must appear in the case caption.
The court will **not** consider a claim against any defendant who is not listed in the caption.

A. Plaintiff(s) Name(s):

Address(es):

Telephone No. (only if
you are NOT a prisoner)

Clotis Goodman

5501 Pinebrook NW Winston Salem NC 27105

336-406-4281

B. Defendant(s) Name(s):

Address(es) If known:

Spafford Pollack

1003 H Street Lincoln NE 68308

Jennifer Stehlik Ladman

653 G Pawnee City NE 68428

Brady Duncan

261 South 8th Street Seward NE 68434

State of Nebraska, Seward County Nebraska

Sheriff department

Thomas R Johnson

367 FRAIL Lane Conway, SC 29526

(Attach extra sheets if necessary.)

II. STATEMENT OF CLAIM(S)

State briefly the facts of your claim. Describe how each defendant is involved. You do not need to give legal arguments or cite cases or statutes. Use as much space as you need to state the facts. (Attach extra sheets if necessary.)

A. When did the events occur?

March 15, 2009 - August 21, 2009 my case was dismissed on June 13, 2011. That's when I found out that Mr. Thomas R. Johnson had my ²⁰⁰⁹ Volvo Truck.

B. What happened?

On March 15, 2009, I owned a 2001 Maroon Volvo Semi Truck and trailer VIN# 4V4NC9GH5IN308593

On March 15, 2009, my semi-truck and trailer were seized by defendant Seward County Sheriff Department. Defendant Seward County Sheriff's Department was aware that title to my truck had been conveyed to me on August 18, 2008. On August 21, 2009, Defendant Jennifer Stehlik Ladman, acting in her capacity as the Seward, Chief Deputy County Attorney for Seward County, Nebraska, requested that Thomas R. Johnson execute a release of liability for my semi-truck and trailer. On August, 2009 the defendants ^{were} ~~was~~ aware that

II. STATEMENT OF CLAIM(S) (continued)

I owned the semi-truck and trailer and I was the only party authorized to sign any documents relating to the truck and trailer. Defendants did not contact, nor have they produced any documented proof that Thomas R. Johnson received a release of liability or a signed release by Thomas R. Johnson was in fact executed in regards to my semi-truck and trailer. Neither Seward County, Nebraska or the Seward County Sheriff's Department were contacted or made aware of the release of liability document referred to above. I was not aware of the release of liability document noted above. I learned that my semi-truck and trailer have been misappropriated and transferred for profit thereby precluding my recovery of property.

III. STATEMENT OF JURISDICTION

Check any of the following that apply to this case (you may check more than one):

☒ United States or a federal official or agency is a party

☒ Claim arises under the Constitution, laws or treaties of the United States

☒ Violation of civil rights

☐ Employment discrimination

☒ Diversity of Citizenship (a matter between citizens of different states in which the amount in controversy exceeds \$75,000)

☐ Other basis for jurisdiction in federal court (explain below)

IV. STATEMENT OF VENUE

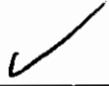
State briefly the connection between this case and Nebraska. For example, does a party reside or do business in Nebraska? Is a party incorporated in Nebraska? Did an injury occur in Nebraska? Did the claim arise in Nebraska?

Venue of this action is proper in this court pursuant to 28 U.S.C. § 1391(b) in that was brought in the federal judicial where the defendants reside, the act complained of occurred and damages resulted

V. RELIEF

VII. ARE YOU REQUESTING TRIAL BY A JURY OR BY A JUDGE? (check one):

JURY



JUDGE

VIII. VERIFICATION

I (we) declare under penalty of perjury that the foregoing is true and correct.

Date(s) Executed:

Signature(s) of Plaintiff(s):

Note:

IF YOU CANNOT AFFORD TO PAY THE COURT'S FILING FEE UPON THE FILING OF YOUR COMPLAINT, THERE IS A SEPARATE FORM TO BE USED FOR APPLYING TO PROCEED IN FORMA PAUPERIS. Also, if there is more than one plaintiff in the case who wishes to proceed in forma pauperis, each such plaintiff must submit a separate application to proceed in forma pauperis.

IN THE DISTRICT COURT OF SEWARD COUNTY, NEBRASKA

STATE OF NEBRASKA,

PLAINTIFF,

v.

CLETIS GOODMAN,

DEFENDANT.

CASE NO: CR09-34

DISMISSAL

FILED
SEWARD CO. DISTRICT COURT
JUN 13 2011
JACQUELYN STEWART
CLERK OF THE DISTRICT COURT

NOW ON THIS 13th day of June, 2011, this matter comes on before the Court on the

State's Motion to dismiss the above captioned matter at State's cost. Upon the information

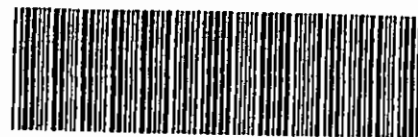
received and being otherwise fully advised in the premises, the Motion is granted. Bond

IT IS SO ORDERED.

BY THE COURT:


DISTRICT COURT JUDGE

- () Defendant
- () County Attorney
- () Attorney for Defendant
- ()



000027303D16

FROM:

10/05/2011 12:10

#238 P.004/004

PAGE1

08-22-2011 11:02 CLETIS B. GOODMAN 33576722449

SEWARD COUNTY ATTORNEY129 SEWARD ST.
SEWARD, NEBRASKA 68474PHONE (402) 643-2795
CHILD SUPPORT (402) 643-3764
FAX (402) 643-4614**WENDY L. BLSTON**
SEWARD COUNTY ATTORNEY**JAMES L. HOPP**
DEPUTY COUNTY ATTORNEY

August 17, 2011

Reginald D. Alston
8 West Third Street Ste #260
Winston-Salem, NC 27101**RE: State v. Cletis B. Goodman; CR09-34**

Dear Mr. Alston:

I am in receipt of your letter to myself and Sheriff Joe Yocum, dated August 10, 2011. On March 15, 2009, Mr. Goodman was found to be hauling 116 lbs. of marijuana on his trailer, which is a crime in the State of Nebraska. Mr. Goodman's criminal charges were dismissed on June 13, 2011, without prejudice to the State on June 13, 2011. The statute of limitations in Nebraska is 3 years. In the field of criminal law, there are many reasons why a case may be dismissed, many which do not mean that the accused is innocent. The dismissal of the referenced charges, by no means imply that Mr. Goodman was innocent of the filed charges. I choose not disclose the reason for my decision in this letter.

As far as Mr. Goodman's semi truck and trailer, it was towed off site from the hotel due to the arrest of the Defendant. The truck and trailer were not being held by the State past August 21, 2009. A copy of the release of evidence was provided to Mr. Goodman via his attorney, on August 21, 2009. Accordingly, any interest the State had in the property terminated on that date. Mr. Goodman and his attorney, at all relevant times, were aware of the location of his truck/trailer. My records do not show any request by your client or his attorney for release of the truck/trailer. Presumably, Mr. Goodman and his attorney understood that the truck/trailer was not in the custody of the State to give consent to release.

My understanding is that Mr. Goodman failed to make arrangements to pick up his truck/trailer from the tow yard, at such time the tow company disposed of the property according to Nebraska law.

Sincerely,


 Wendy L. Blston
 Seward County Attorney

From:

10/05/2011 12:10

#238 P.003/004

RELEASE OF LIABILITY

I, Thomas R. Johnson, do hereby release Seward County, the Seward County Sheriff's Office, and any employee therewith, of any claim, right or obligation as to the condition of the following vehicle, owned by me, as a result of the actions on the part of law enforcement on March 15, 2009. I understand that I am accepting responsibility for my vehicle in its current condition and that Seward County and the Seward County Sheriff's Office will not be held responsible for alterations made to the structure or mechanical fitness of the vehicle which may effect the vehicle's road worthiness, and said entities and their employees will not be held liable for any damage or injury caused by the vehicle's subsequent use.

Vehicle Description: Semi Truck

Make/Model: Volvo

Year: 2001

Color: Maroon

VIN: 4V4NC9GH5IN308593

DATED this _____ day of _____, 2009.

D.O.B.: _____

Address: _____

Phone: _____

SEWARD COUNTY ATTORNEY

529 SEWARD ST.
SEWARD, NEBRASKA 68434

PHONE (402) 643-2795
CHILD SUPPORT (402) 643-3764
FAX (402) 643-4614

WENDY L. ELSTON
SEWARD COUNTY ATTORNEY

JENNIFER STEHLIK LADMAN
CHIEF DEPUTY COUNTY ATTORNEY

JAIME L. HOPP
DEPUTY COUNTY ATTORNEY

August 21, 2009

Seward Sheriff's Office
261 S. 8th
Seward, NE 68434

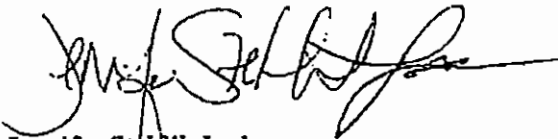
RE: State of Nebraska v. Cletis Goodman

Deputy *DUNCAN*

This is authorization for you to release the vehicle and its contents, seized on March 15, 2009, to the vehicle's owner, Thomas R. Johnson. Mr. Johnson is required to sign the release of liability prior to the release of said vehicle. If any items of personal property are not released to Mr. Johnson at this time, prepare an inventory of seized property, to be signed by him, and provide a copy to Mr. Johnson for his records.

If you have any questions, feel free to contact me.

Sincerely,



Jennifer Stehlik Ladman
Seward Chief Deputy County Attorney
529 Seward St.
Seward, NE 68434
(402) 643-2795

JSL/tmr

cc: Sandy Pollack
Hymark Towing

5

STATE OF SOUTH CAROLINA					
CERTIFICATE OF TITLE					
OF A VEHICLE					
VEHICLE ID NUMBER	YEAR	MAKE	MODEL	NEW/USED	
4V6NC9GH51N308593	2001	VOLVO	VOLVO	USED	
BODY STYLE	DATE ISSUED	ODOMETER	WEIGHT	TITLE NUMBER	
TK	01-21-2008		18000	770260186255329	
VEHICLE BRAND(S)					
EXEMPT					
FULL NAME OF OWNER(S)			CUSTOMER NUMBER: 024012864		
JOHNSON, THOMAS R.					
387 FRAIL LN					
CONWAY SC 295268337					
FIRST LIENHOLDER			1ST LIEN RELEASED		
CONWAY NATIONAL BANK			8/18/08		
110 HIGHWAY 17 N			(DATE)		
NORTH MYRTLE BEACH SC 295823038			BY		
DATE OF LIEN			(AUTHORIZED AGENT)		
01/14/2008					
<p>THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.</p> <p>MARCIA S. ADAMS</p> <p>MARK SANFORD</p>					

REMOVE SIDE EDGES FIRST
THEN SLIDE FINGER UNDER LONG EDGE TO OPEN

SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES

ASSIGNMENT OF A VEHICLE

Buyer and Seller hereby certify that they agree the mileage in connection with the transfer of ownership. Failure to complete or providing a false statement may result in these motor-transportation. NOTICE: ANY ALTERATIONS OR ERASURE VOIDS THE ASSIGNMENT. ASSIGNMENT(S) MUST BE MADE IN DARK INK

The undersigned hereby certifies that title to the vehicle described herein has been transferred on this 18 day of August year 2008 and is subject to the following lien:

Name of Lienholder _____ Address _____ State _____ City _____ Zip Code _____

Name of Lienholder _____ Address _____ State _____ City _____ Zip Code _____

I certify to the best of my knowledge that the odometer reading is the ACTUAL mileage of the vehicle unless one of the following statements is checked: STOP! DO NOT check one of the following unless it applies.

Odometer Reading (no tenths) _____

- ☐ 1. The mileage stated is in excess of its mechanical limits.
☐ 2. The odometer reading is not the actual mileage.
WARNING: ODOMETER DISCREPANCY

Date of Sale _____
Sales Price \$7500.00
Latter Trade-in _____
Trade-in Total _____

I am aware of the above odometer certification made by the seller(s).

Signature(s) of Buyer(s) Victor B. Jordan Signature of Seller(s) Thomas R. Johnson

Hand Print Name(s) of Buyer(s) Victor B. Jordan Hand Print Name(s) of Seller(s) THOMAS R. JOHNSON

Hand Print Name of Buyer(s) Victor B. Jordan Address 307 HAIL LANE CONWAY SC 29526

ASSIGNMENTS BY DEALER/WHOLESALE/AUCTION

The undersigned hereby certifies that title to the vehicle described herein has been transferred on this _____ day of _____ year _____ to:

Name _____ Street _____ City _____ State _____ Zip Code _____ and is subject to the following lien:

Name of Lienholder _____ Address _____ State _____ City _____ Zip Code _____

Name of Lienholder _____ Address _____ State _____ City _____ Zip Code _____

I certify to the best of my knowledge that the odometer reading is the ACTUAL mileage of the vehicle unless one of the following statements is checked: STOP! DO NOT check one of the following unless it applies.

Odometer Reading (no tenths) _____

- ☐ 1. The mileage stated is in excess of its mechanical limits.
☐ 2. The odometer reading is not the actual mileage.
WARNING: ODOMETER DISCREPANCY

Dealer/Wholesaler
Auction License Number _____

I am aware of the above odometer certification made by the seller(s).

Signature(s) of Buyer(s) _____ Signature of Seller(s) Victor B. Jordan

Hand Print Name(s) of Buyer(s) _____ Hand Print Name(s) of Seller(s) Victor B. Jordan

Hand Print Name of Buyer(s) _____ Address 5501 PINEHURST LANE WILMINGTON NC 28405

The undersigned hereby certifies that title to the vehicle described herein has been transferred on this _____ day of _____ year _____ to:

Name _____ Street _____ City _____ State _____ Zip Code _____ and is subject to the following lien:

Name of Lienholder _____ Address _____ State _____ City _____ Zip Code _____

Name of Lienholder _____ Address _____ State _____ City _____ Zip Code _____

I certify to the best of my knowledge that the odometer reading is the ACTUAL mileage of the vehicle unless one of the following statements is checked: STOP! DO NOT check one of the following unless it applies.

Odometer Reading (no tenths) _____

- ☐ 1. The mileage stated is in excess of its mechanical limits.
☐ 2. The odometer reading is not the actual mileage.
WARNING: ODOMETER DISCREPANCY

Dealer/Wholesaler
Auction License Number _____

**CFI**

CANAL INSURANCE COMPANY

VIN SEARCH

Welcome Jan Wilson! [Logout](#)
for **Canal Insurance Company** ▼

Carrier Search**VITAL Search****SALES Search**[\[+\] Hide](#)

Searching

37,700,427 Inspections

2,935,139 Accidents

63,043,091 Vehicles

1. Please fill out *at least* one of the following search fields:

VIN	Equals ▼	4V4NC9GH51N308593	Docket #	MC ▼	
License #	Equals ▼		State ID (DOT/PUC) #		
			US DOT #		

2. Optional - Specify any additional filter parameters

Inspection Date	From		Registered State (abbr.)	All ▼
	To		Vehicle Type	All ▼

3. Choose output options:

Group results by	<input checked="" type="radio"/> Vin <input type="radio"/> License #	Display	Inspections and Accidents ▼
------------------	--	---------	-----------------------------

[Search](#) [Reset](#)[View Search History](#)

Vehicle Information

WMI	4 - United States ; V4 - VOLVO COMPLETE	AXLES	3 AXLES
MAKE	2001 VOLVO COMPLETE (NCIC: VOLV)	TYPE	TRUCK TRACTOR (CAB ONLY WITH / WITHOUT TRAILER(S))
MODEL	6X4 TRUCK TRACTOR CONV.	GVWR	> 33,000 LBS

 [Download to Excel](#)

① VIN: 4V4NC9GH51N308593

🔍 DOT #: 244311 - T S EXPEDITING SERVICE INC, 27681 CUMMINGS ROAD, MILLBURY, OH 43447-9762

	Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
Details	10/11/06	OK	US69 ATT-40		TRUCK TRACTOR	VOLV	R7FH55	TX

🔍 DOT #: 1454218 - ADAMS FAMILY TRANSPORT LLC, 306 HADLEY HALL RD, WEST COLUMBIA, SC 29172

	Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
Details	3/13/08	NM	LORDBURG PORT OF ENTRY	CLETIS B. GOODMAN	TRUCK TRACTOR	VOLV	P799807	SC

🔍 DOT #: 1681550 - ROSE AUTO GROUP LLC, 2700 FEATHER RUN TRL APT G8, WEST COLUMBIA, SC 29169

	Date	State	Loc	Carrier Search ▾	VITAL Search ▾	SALES Search ▾	About CAB ▾	My Ac
Details	5/2/08	CA	WINTERHAVEN AREA					

🔍 DOT #: 1453852 - CLETIS B GOODMAN TRUCKING LLC, 5501 PINEBROOK LANE, WINSTON SALEM, NC 27105

	Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
Details	6/9/08	WA	SC 33 BOW HILL (POE)	ROSE AUTO GROUP	TRUCK TRACTOR	VOLV	P799807	SC

Q DOT #: 1454218 - ADAMS FAMILY TRANSPORT LLC, 306 HADLEY HALL RD, WEST COLUMBIA, SC 29172

Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
8/1/08	NM	LORDSBURG PORT OF ENTRY	JAM JONE	TRUCK TRACTOR	VOLV	P799807	SC

Q DOT #: 1453852 - CLETIS B GOODMAN TRUCKING LLC, 5501 PINEBROOK LANE, WINSTON SALEM, NC 27105

Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
1/11/09	CA	RAINBOW IF		TRUCK TRACTOR	VOL	P799807	SC

Q DOT #: 1705230 - THOMAS R JOHNSON, 367 FRAIL LANE, CONWAY, SC 29526

Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
6/21/11	SC	FLORENCE CNTY SECONDARY ROADS		TRUCK TRACTOR	VOLV	P719743	SC

Violations:	Code:	Description:	Category:
	396.17c	Operating a CMV without proof of a periodic inspection	PERIODIC INSPECTION
	393.9a	Inoperative required lamps	LIGHTING
	393.9a	Inoperative required lamps	LIGHTING
	393.24a	Noncompliance with headlamp requirements	LIGHTING

Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
11/16/11	NC	US701 NEAR NC131		TRUCK TRACTOR	VOLV	P719743	SC

Violations:	Code:	Description:	Category:
	393.9H	Inoperative head lamps	LIGHTING

Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
4/19/12	SC	US 701 GEORGETOWN COUNTY		TRUCK TRACTOR	VOLV	P719743	SC

Date	State	Location	Shipper Name	Unit Type	Unit Make	Unit License	License State
7/25/12	NC	US-701 NEAR NC131		TRUCK TRACTOR	VOLV	P719743	SC

Violations:	Code:	Description:	Category:
	396.3a1	Inspection/repair and maintenance parts and accessories	ALL OTHER VEHICLE DEFECTS

Joseph O. Yocum
Seward County Sheriff
281 South 8th Street
Seward, Nebraska 68434

REASON CHECKED

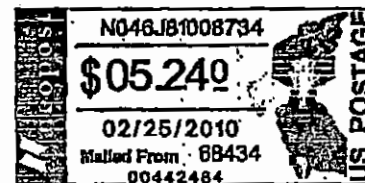
- ☐ Moved, Left No Address
☐ Return For Postage
☐ Temporary Mailing
☐ Attempted Delivery
☐ Refused



7008 1830 0002 5342 3077

BUILDING HAS BEEN TORN
2213432221 0004
5843402417

REASON CHECKED
☐ Moved, Left No Address
☐ Return For Postage
☐ Temporary Mailing
☐ Attempted Delivery
☐ Refused
NIXIE
201 SE 1
72 02/28/10
RETURN TO SENDER
NO SUCH STREET
UNABLE TO FORWARD
BC 68434241761 *2293-07456-25-42
6843402417



RECEIVED

MAR 04 2010

SEWARD COUNTY SHERIFF
SEWARD, NE 68434

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p> <input checked="" type="checkbox"/> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. </p> <p>1. Article Addressed to:</p> <p>CLETIS B. GORDON TRUCKING 3503 E. B. QUARTERS REASON CHECKED 22134-2221 VA</p> <p> <input checked="" type="checkbox"/> Delivered, Left No. Address <input checked="" type="checkbox"/> Delivered to Person <input checked="" type="checkbox"/> Temporarily Absent <input type="checkbox"/> Attempted, No. Known <input type="checkbox"/> Refused <input type="checkbox"/> Other </p> <p>2. Article Number: 7008 1630 0002 5342 3077</p> <p>(Transfer from service label)</p>		<p>A. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> O.D.B.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, February 2004</p>		<p>Domestic Return Receipt</p> <p>10250-02-11-1340</p>	

**OFFICE OF THE SHERIFF
SEWARD COUNTY**

261 South 8th Street
Seward, NE 68434

Phone (402) 643-2359
FAX (402) 643-4852



Joseph O. Yocum
Sheriff

February 25, 2010

Cletis B. Goodman
3503 B Quarters
Quantico, VA 22134-2221

RE: Abandoned Motor Vehicle
VIN: 5EOAX134X7G164801
Make: Cottrell
Model: trailer
Year: 2007
Color: black

U.S. Postal Service
CERTIFIED MAIL[®] RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

SEWARD COUNTY NEBRASKA

Postage	\$.44
Certified Fee	2.80
Return Receipt Fee (Endorsement Required)	2.30
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.54

SEWARD NEBRASKA
FEB 25 2010
68434

Sent to
CLETIS B. GOODMAN TRUCKING
Street, Apt. No. or PO Box No. **3503 B QUARTERS**
City, State, ZIP+4[®]
QUANTICO, VA 22134-2221
PS Form 3800, August 2005 See Reverse for Instructions

4206 2435 2000 0897 9004

According to the records of the Department of Motor Vehicles, you are the last registered owner of the vehicle identified above. This vehicle has been abandoned, and if not claimed within 30 days, the Seward County Sheriff's Office will sell, auction or retain such vehicle for our own use. This is in accordance with Nebraska State Statutes 60-1901 to 60-1911.

You may claim the vehicle by presenting proof of identification and paying the towing and storage fees within the next 30 days. You may contact us to learn the cost of those fees, the location of your vehicle, or to tell us your intent to regain the vehicle or to disclaim it.

If you fail to respond to this letter, we will dispose of the vehicle 30 days after the above date. If the vehicle is auctioned or sold, the proceeds from the sale, less any towing, storage and sale expenses will be held without interest for you or any lien holders for two years.

Please feel free to call this office at (402) 643-2359 with any questions you may have.

Sincerely,

David D. Wood
Sergeant

DDW/

**AFFIDAVIT AND REQUEST FOR CERTIFICATE OF TITLE
FOR ABANDONED MOTOR VEHICLE**

COPY

STATE OF NEBRASKA,)
) ss.
COUNTY OF SEWARD)

David D. Wood, being first duly sworn on oath, deposes and says that

He is the Sergeant and an agent of, Seward County Sheriff's Office, State of Nebraska. That Seward County Sheriff's Office is currently in possession of the following described motor vehicle: 2007 Cottrell 48 ft. flatbed car trailer , VIN: 5EOAX134X7G164801.

That the aforesaid motor vehicle was abandoned with Hy-Mark Towing 575 South st., Staplehurst, NE 68439., Seward County, Nebraska, and that after due and diligent notice and inquiry, said motor vehicle remains unclaimed or the ownership is unknown. Further, that notice was sent by Certified or Registered United States Mail to all owners of record, and to all parties found as a result of notice and inquiry to have a lien or mortgage against the title to such motor vehicle.

The last owner of record is: Cletis B. Goodman Trucking, 3503 B Quarters, Quantico, VA 22134-2221 ; said address no longer exists; building torn down per postal service..

That the foregoing statements are such evidence as Seward County Sheriff's Office has, and is requested to issue a Certificate of Title to Seward County Sheriff's Office which will allow it to dispose of the aforesaid motor vehicle pursuant to Neb. Rev. Stat. §60-1901 et. seq.

DATED this 10th day of March, 2010, .



Subscribed and sworn to before me this 11th day of March, 2010




Notary Public



APPLICATION FOR CERTIFICATE OF TITLE

FEE \$10.00

APPLICATION SHOULD BE PRESENTED TO THE DESIGNATED COUNTY OFFICIAL IN THE
COUNTY WHERE THE VEHICLE HAS SITUS

APPLICATION FOR DUPLICATE CERTIFICATE OF TITLE SHOULD BE MADE ON THE REVERSE SIDE.

☐ Salvage ☐ Previously Salvaged ☐ Non-Transferable ☐ Manufacturer Buyback ☐ Taxi Use ☐ Yes ☒ No

Vehicle/Hull Identification Number <u>5EOAX134X7G164801</u>			
<u>2007</u>	<u>Cottrell</u>	<u>car trailer</u>	<u>48 ft</u>
Year	Make	Model	Body Style/Hull Length
<u>black</u>			
Color	GVWR/Hull Material	Capacity/Propulsion	

APPLICANT(S) INFORMATION

Applicant(s) hereby state that he/she/they is/are the lawful owner(s) or purchaser(s) of the vehicle described above and make application for a Certificate of Title.

SEWARD CO. AUTHORITY

Last Name	First Name	Middle Initial
-----------	------------	----------------

Last Name	First Name	Middle Initial
-----------	------------	----------------

Last Name	First Name	Middle Initial
-----------	------------	----------------

<u>261 SO. 8TH ST.</u>	<u>SEWARD</u>	<u>NE</u>	<u>68434</u>
Address (Street or RR and PO Box)	City	State	Zip

Mailing Address (If other than above)

The undersigned being duly sworn depose or affirm and say that the information provided on this application is true and complete. Use of a false or fictitious name, knowingly making a false statement or knowingly concealing a material fact in this application can result in a fine or imprisonment or both and cancellation of your certificate of title.

Signature of Applicant

[Signature] SCA

Signature of Applicant

Signature of Applicant

03-11-2010

Date

LIEN INFORMATION

FEE \$7.00

The following is a full statement of all liens, mortgages or encumbrances on said vehicle:

If none, state here none

If more than two liens noted, please check ☐

First Lien: Name and Address of Lienholder

Second Lien: Name and Address of Lienholder

Note: A copy of the lien instrument must be presented before a lien can be noted.

SALVAGE vehicle is a late model vehicle that has been wrecked, damaged or destroyed to the extent that the estimated total cost of repair to restore it to its condition prior to being wrecked, damaged or destroyed, and a condition for legal operation upon the highways, exceeds 75% of the retail value of the vehicle at the time the vehicle was wrecked, damaged or destroyed.

- When an insurance company acquires a vehicle through payment of a total loss settlement on account of damage, they are required to obtain a SALVAGE Certificate of Title.
- Any person who acquires ownership of a SALVAGE vehicle shall obtain a SALVAGE Certificate of Title prior to use or sale of the vehicle or any major component part.

NEBRASKA CERTIFICATE OF TITLE

VEHICLE IDENTIFICATION/HULL NUMBER YEAR MAKE BODY STYLE/HULL LENGTH
 5E0AX134X7G164801 2007 COTTRELL CAR TRAILER 48'

PURCHASE DATE ISSUE DATE PREVIOUS TITLE NUMBER/STATE TITLE TYPE
 3/11/2010 3/11/2010 COLOR ABANDON ORIGINAL
 BLK

GVWR/HULL MATERIAL CAPACITY/PROPULSION ODOMETER/WATERCRAFT REGISTRATION
 EXEMPT

LEGENDS

OWNER(S) NAME AND ADDRESS

SEWARD CO AUTHORITY
 261 SO 8TH STREET
 SEWARD, NE 68434

PREVIOUS OWNER(S) / CITY / STATE

CLETIS B. GOODMAN TRUCKING
 QUANTICO, VA 22134

1ST LIEN

2ND LIEN

Subsequent
Lien Filed

LIEN RELEASES

First Release By:	
Title:	Date (mo, day, yr.):
County:	Date (mo, day, yr.):
Second Release By:	
Title:	Date (mo, day, yr.):
County:	Date (mo, day, yr.):

SELLER MUST COMPLETE

PURCHASER'S INFORMATION

Federal and State law requires that the seller state the mileage in possession with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment. (RETAIN COPY FOR 5 YEARS)
 The undersigned, being the owner of the vehicle described within the Certificate of Title, hereby sells and assigns all right, title and interest in and to said Certificate of Title and the vehicle described therein to the following named purchaser:
 I certify to the best of my knowledge that the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked:

ODOMETER READING ☒ NO MILEAGE ☐ 1. The odometer reading is in excess of its mechanical limits.
☐ 2. The odometer reading is not the actual mileage. WARNING--ODOMETER DISCREPANCY.

ALL OWNERS WHOSE NAMES APPEAR ON
 THE FACE OF THIS TITLE MUST SIGN.

Name of Purchaser(s)

Signature of Seller

Address

Signature of Seller

City

State

Zip

Signature of Seller

I AM AWARE OF THE ODOMETER STATEMENTS
 MADE BY THE SELLER(S)

Printed Name of Seller (Only One Printed Name Required)

Signature of Purchaser

Date of Sale

Printed Name of Purchaser

INVENTORY CONTROL NUMBER
 D01674086

COUNTY
 SEWARD

TITLE NUMBER
 10070160001

County Official

WITNESS MY HAND AND OFFICIAL SEAL THE DAY SHOWN ABOVE

BOB DAHMS

Bob Dahms

SEAL OF THE CLERK OF
 SEWARD COUNTY
 NEBRASKA

By

PS TOTAL:

REV 12/02

D01674086



JOSEPH O. YOCUM
SEWARD COUNTY SHERIFF

261 South 8th Street
Seward, Nebraska 68434

Phone: (402) 643-2359
Fax: (402) 643-4852

PC 00
16
Cook
2-17-10

APPLICATION FOR ABANDONED VEHICLE TITLE

Request being made by:

Company /Name Mr. MARK TOWNS

Address 245 A STAPKUNST NE 68435
Street City State Zip Code

Phone 643-5858 Date of Request 2-16-2010

Signature [Signature]

Description:

Make of Vehicle TRAILER Model COTTRELL Year 07

Color BLACK LIC 55-005 VA ST VIN: 5 EOAX X 6 134 7 164801

Location of Vehicle: HWY 15 SUPERTX

Date vehicle was abandoned 3-15-2009 Circumstances/Reason Arrest

***** DO NOT WRITE BELOW THIS LINE OFFICE USE ONLY *****

INSPECTED BY: _____ DATE: _____ MILEAGE: None

OWNER NAME: _____ DATE OF LETTER: _____

LIEN HOLDER NAME: _____ DATE OF LETTER: _____

AFFIDAVIT INFORMATION

Card/Letter Returned date: _____ Affidavit due date: _____

Affidavit completed date: _____ Charge: _____ Date Paid: _____

VINCENT VALENTINO
ATTORNEY AT LAW

Vincent Valentino
Brandy Johnson

CenterStone
100 N. 12th St., Suite 200
P.O. Box 84640
Lincoln, NE 68501-4640

Telephone: 402.742.9240
Fax No: 402.742.9250

February 11, 2015

Reginald D. Alston
Attorney at Law
8 West Third Suite 260
Winston-Salem, NC 27101

RE: Cletis D. Goodman

Dear Mr. Alston:

Your letter of January 7, 2015 sent to the Seward County Attorney has once again been referred to me. Why you insist on contacting my clients directly remains a mystery to me.

On April 13, 2013, the case of *Goodman v. State of Nebraska, et. al.*, Case No. 8:12-cv-00202 was dismissed by the United States District Court for the District of Nebraska. All of the operative events alleged in the Complaint filed set forth dates of March 15th, 2009 through August 21st, 2009.

On March 28, 2013, you and I, and the adjuster assigned to this file had a conversation at which time an offer was extended of fifty thousand dollars (\$50,000.00) to settle the matter. A release was prepared for that amount for your client to sign if he accepted. You told me you would speak with your client and get back to me. You called me within the hour and asked if the County would settle for sixty thousand dollars ((\$60,000.00)), and you were advised at that time the offer would not be increased. You never re-contacted our office again.

Unfortunately for your client, there is a four year statute of limitations in Nebraska that controls civil rights claims like the one that was asserted in the dismissed complaint referenced above. We believe the claim of Mr. Goodman is now time-barred. Thank you.

Sincerely,



Vincent Valentino
Attorney at Law

cc: Wendy Elston, Seward County Attorney
Bill Hilton